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PLEASE TAKE NOTICE that defendant, The Walt Disney Company hereby removes this civil action, pending in the Law Division of the Superior Court of New Jersey, Essex County, Docket No. L-3911-13 (the “State Court Action”), to the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. §1441 and §1446, as amended, and in accordance with 28 U.S.C. §1332, on the following grounds:

1. Plaintiff instituted the State Court Action by filing a Complaint in the Superior Court of New Jersey, Essex County on May 20, 2013. In the Complaint, plaintiff Patricia J. Porcello alleges personal injuries as a result of an incident that allegedly occurred at the Disneyland Paris Resort in Paris, France on October 14, 2012. (Exhibit A). Plaintiff served the Complaint upon The Walt Disney Company pursuant to N.J.Ct.R. 4:4-4(c) on June 10, 2013. (Exhibit B). Upon information and belief, to date Defendants Euro Disney S.C.A., and Euro Disney Associates S.C.A. have not been served.

2. Defendant The Walt Disney Company is a Delaware corporation, and is not registered to do business in New Jersey. Defendants Euro Disney S.C.A., and Euro Disney Associates S.C.A. are both French entities, and neither is registered to do business in New Jersey. Upon information and belief, and as alleged in the Complaint, plaintiff resides at 18 Surrey Lane, East Hanover, New Jersey. (Exhibit A).

3. In the Complaint, Ms. Porcello states that her alleged injuries were disabling and permanent. She indicates that her alleged injuries caused her to incur surgery and that she has had and will have future medical bills, lost wages and other special damages. Upon information and belief, plaintiff will seek damages in excess of \$75,000 in this action.

4. Diversity jurisdiction exists in this matter pursuant to 28 U.S.C. §1332, which provides for original jurisdiction of all civil actions in the district court between citizens of different states and/or citizens of a state and citizens or subjects of a foreign state where the amount in controversy exceeds the value of \$75,000, exclusive of interest and costs.

5. Venue of this removal is proper under 28 U.S.C. § 1441(a) because this Court is the United States District Court for the district corresponding to the place where the State Court Action is pending. Removal of this case to the United States District Court for the District of New Jersey does not constitute a waiver by The Walt Disney Company of any of its rights, including its right to seek dismissal of this lawsuit. Moreover, removal of this lawsuit shall not subject any defendants or any later-joined defendant to jurisdiction in this state.

6. As required by 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders are annexed hereto.

7. This Notice of Removal satisfies the requirements of §1446(b) because The Walt Disney Company has filed this Notice of Removal within 30 days of service of plaintiff's Complaint.

8. Pursuant to 28 U.S.C. § 1446(d), written notice of the removal of this action has been given simultaneously to plaintiff's counsel, and a Notice of Filing of Notice of Removal is simultaneously being filed with the Essex Superior Court of the State of New Jersey. (Exhibit C).

WHEREFORE, The Walt Disney Company prays this court will remove this action from the Superior Court of New Jersey, Law Division, Essex County, and requests that further proceedings be conducted in this court as provided by law.

Respectfully submitted,

Drinker Biddle & Reath LLP  
Attorneys for Defendant,  
The Walt Disney Company

By: s/Erin M. Turner  
Erin M. Turner

July 8, 2013